Response for TCEQ Request for BOP Outfall 002 – TPDES WQ0002184000

This information is being provided as supplemental to the verbal notification made at 1:30 PM on 8/1/2019, summarizing the comingled stormwater / emergency firefighting water via BOP Outfall 002 discharged between 7/31 16:49 – 8/1 2:23.

On 7/31/2019 the Baytown Olefins Plant (BOP) Propylene Recovery Unit Depropanizer Tower (NT-01), located at 3525 Decker Road in Baytown, TX experienced a fire which resulted in emissions to atmosphere and safe utilization of the flare system.

Based on discussions with TCEQ Region 12, this discharge is being evaluated for potential classification as an unauthorized discharge. At the time of this report ExxonMobil believes it does not meet the definition of an unauthorized discharge due to the definition of unauthorized discharge in the permit, TPDES general conditions authorizing discharges from emergency firefighting activities, as well as available water quality results associated with the discharge at the time of this report.

Based on available field and laboratory analytical results received at this time, the discharge was within the acceptable Outfall 002 permit limits. Although the emergency fire water is anticipated to be uncontaminated, more detailed analytical results were collected during the discharge and additional parameters are currently being analyzed. A written 5-Day report will be provided to TCEQ and will incorporate analytical results received at that time.

Discharge start times, stop times, and volume with available analytical results are included in the attached table.

Please note ExxonMobil will provide verbal notification to TCEQ Region 12 of Discharge 2 (8/1/2019 17:29 – 23:25) in accordance with BOP TPDES Permit under the Monitoring and Reporting Requirements 7a.

	Discharge 1 7/31 16:49 - 8/1 2:23		Discharge 2 8/1 17:29-23:25
Discharge Sample No.	1	2	3
Start Time	7/31/2019 16:49	8/1/2019 0:02	8/1/2019 17:29
Stop Time	7/31/2019 23:33	8/1/2019 2:23	8/1/2019 23:25
Total Discharge Vol (Mgal)	10.4		7.4
Discharge Segment Vol (Mgal)	8.4	2.0	7.4
Sample Time	16:35 19:24 (BTEX)	0:55	17:29 (O/G, TOC,pH) 7:00:00 PM Special Samples
pH (S.U.)	7.5	7.33	7.7 / 7.7
TOC (mg/L)	5.35	22	Pending
O&G (mg/L)	< 3.1	1.3 J	Pending
Benzene (ug/L)	2.7 J	2.09 J	Pending
Toluene (ug/L)	< 0.550	<0.550	Pending
Ethylbenzene (ug/L)	< 1.29	< 1.29	Pending
Xylenes (ug/L)	< 0.93	< 0.93	Pending
CBOD (mg/L)	---	Pending	Pending
TSS (mg/L)	---	77.6	Pending
Phenolic Compounds (ug/L)	---	0.00492 J,B	Pending
Ammonia as Nitrogen (mg/L)	---	Pending	Pending
Nitrate (as N) (mg/L)	---	0.416 F1	Pending
Sulfide	---	0.0311 J,F1	Pending
Chromium, Total (ug/L)	---	4.23	Pending
Chromium, Hex (ug/L)	---	0.00595 J	Pending
PNA Hydrocarbons (ug/L)	---	Pending	Pending
Ethylene	---	Pending	Pending
Propane	---	Pending	Pending
Propylene	---	Pending	Pending
Asbestos	---	Pending	Pending
Metals (ug/L)	---	Pending	Pending
- aluminum	---	Pending	Pending
- antimony	---	6.4	Pending
- arsenic	---	5.08	Pending
- Barium	---	Pending	Pending
- Beryllium	---	0.163 J	Pending
- Cadmium	---	0.075 J	Pending
- Chromium, trivalent	---	Pending	Pending
- Copper	---	7.41	Pending
- Cyanide	---	Pending	Pending
- Lead	---	4.52	Pending
- Mercury	---	Pending	Pending
- Nickel	---	3.55	Pending
- Selenium	---	<0.315	Pending
- Silver	---	<0.404	Pending
- Thallium	---	0.153	Pending
- Zinc	---	113 B	Pending